

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CROWN CLOTHING CORPORATION,

Plaintiff,

v.

RANDCORE, INC.,
RAND INTERNATIONAL TRADING,
INC., ANDRE BERNARD, AND
RONALD BERNARD,

Defendants.

CIVIL ACTION NO. 05-10049 (NG)

**JOINT MOTION TO AMEND REVISED JOINT STATEMENT AND PRETRIAL
SCHEDULE TO EXTEND THE CURRENT DEADLINE FOR COMPLETION OF
FACT DISCOVERY FROM DECEMBER 29, 2006 TO JANUARY 31, 2007**

In support of this Motion, plaintiff Crown Clothing Corporation ("Crown Clothing") and remaining defendant Ronald Bernard, constituting all of the remaining parties to this action, hereby state that on October 25, 2006 this Court approved the Stipulation and Revised Joint Statement and Pretrial Schedule, a copy of which is appended hereto as Exhibit A. Since that time some, but not all, of the necessary discovery has been completed and Crown Clothing and Andre Bernard, Randcore, Inc, and Rand International Trading, Inc., the other three defendants against whom Separate And Final Judgment was entered in this action, have been attempting to resolve all of the claims between all of the parties to this action. As a result, there is some remaining discovery which cannot be completed during the last two weeks of December which the parties can complete before the end of January. The proposed extension of the fact discovery period does not in any way change any of the other deadlines in the case, and this brief extension will not further delay the preparation of the case.

WHEREFORE, the parties jointly request that the date for completion of fact discovery in paragraph A.1 of the Stipulation and Revised Joint Statement and Pretrial Schedule be extended to January 31, 2007, and that all of the other dates set forth in the Stipulation and Revised Joint Statement and Pretrial Schedule approved by the Court on October 25, 2006 remain the same.

/s/ John C. Wyman

John C. Wyman (BBO#535620)
Ryan M. MacDonald (BBO#654688)
Murtha Cullina LLP
99 High Street, 20th Floor
Boston, Massachusetts 02110
(617) 457-4000
jcwyma@murthalaw.com
rmacdonald@murthalaw.com

*Attorneys for Plaintiff
Crown Clothing Corporation*

/s/ James M. Vant

Gary R. Greenberg (BBO#209420)
Annapoorni R. Sankaran (BBO#631065)
James M. Vant (BBO#653616)
Greenberg Traurig, LLP
One International Place, 20th Floor
Boston, Massachusetts 02110
(617) 310-6000
greenbergg@gtlaw.com
sankarana@gtlaw.com
vantj@gtlaw.com

Attorneys for Defendant Ronald Bernard

Dated: December 14, 2006

EXHIBIT A

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CROWN CLOTHING CORPORATION,)	
)	
Plaintiff,)	
)	
v.)	CIVIL ACTION NO. 05-10049 (NG)
)	
RANDCORE, INC.,)	
RAND INTERNATIONAL TRADING,)	
INC., ANDRE BERNARD, AND)	
RONALD BERNARD,)	
)	
Defendants.)	

STIPULATION AND REVISED JOINT STATEMENT AND PRETRIAL SCHEDULE

Pursuant to FED. R. CIV. P. 26(f) and Local Rules 16.1(d) and (g), counsel for plaintiff Crown Clothing Corporation ("Crown Clothing") and defendant Ronald Bernard, having conferred in good faith concerning the need for an amended schedule for discovery and other pretrial matters in this action, and having reached agreement and so stipulated and jointly moved, respectfully submit this Stipulation and Revised Joint Statement and Pretrial Schedule for approval and entry by the Court.

A. Proposed Discovery Plan, Schedule for Dispositive Motions, and Trial

1. Close of Fact Discovery. All fact discovery shall be completed by December 29, 2006.

2. Experts.

a. Crown Clothing shall serve the reports of its expert witnesses on or before January 26, 2007;

b. Ronald Bernard shall serve the reports of his expert witnesses on or before February 26, 2007.

c. All expert discovery shall be completed by March 26, 2007.

3. Dispositive Motions.

a. All motions pursuant to Federal Rule of Civil Procedure 56 shall be served and filed on or before April 27, 2007.

b. All oppositions to motions pursuant to Federal Rule of Civil Procedure 56 shall be served and filed on or before May 25, 2007.

c. All replies in support of motions pursuant to Federal Rule of Civil Procedure 56 shall be served and filed on or before June 22, 2007.

d. Hearing on motions pursuant to Federal Rule of Civil Procedure 56 shall be scheduled for July 2007, or at the discretion of the Court.

4. Trial. Trial of this matter shall be scheduled for September 2007, or at the discretion of the Court.

/s/ John C. Wyman
John C. Wyman (BBO#535620)
Ryan M. MacDonald (BBO#654688)
Murtha Cullina LLP
99 High Street, 20th Floor
Boston, Massachusetts 02110
(617) 457-4000
jcwyma@murthalaw.com
rmacdonald@murthalaw.com

*Attorneys for Plaintiff Crown
Clothing Corporation*

/s/ Gary R. Greenberg
Gary R. Greenberg (BBO#209420)
Annapoorni R. Sankaran (BBO#631065)
James M. Vant (BBO#653616)
Greenberg Traurig, LLP
One International Place, 20th Floor
Boston, Massachusetts 02110
(617) 310-6000
greenbergg@gtlaw.com
sankarana@gtlaw.com
vantj@gtlaw.com

Attorneys for Defendant Ronald Bernard

SO ORDERED:

United States District Judge

Dated: _____

CERTIFICATE OF SERVICE

I, James M. Vant, hereby certify that on October 24, 2006, I served a copy of the Stipulation and Joint Motion to Amend Revised Joint Statement and Pretrial Schedule upon the following counsel via First Class U.S. Mail, or as otherwise indicated.

John C. Wyman, Esq.
Ryan M. MacDonald, Esq.
Murtha Cullina LLP
99 High Street, 20th Floor
Boston, Massachusetts 02110

Via Hand-Delivery

James M. Vant
James M. Vant